



Valley Telephone Cooperative    Copper Valley Telephone    Valley Connections, LLC

Valley Telecommunications - Cellular - Internet - Business Systems

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Received & Inspected

**MAR - 3 2008**

FCC Mail Room

Annual 64.2009(e) CPNI Certification for 2008

**DOCKET FILE COPY ORIGINAL**

Date filed: February 25, 2008

Name of company covered by this certification: Valley Telephone Coop. Inc.

Form 499 Filer ID: 801033

Name of signatory: Hannah McElroy

Title of signatory: Compliance Officer/Customer Service Manager

I, Hannah McElroy, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

*Hannah McElroy*



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Valley Telephone Coop. Inc. (VTC) and its affiliates have established operating procedures that are designed to ensure compliance with the CPNI rules and requirements in Subpart U of Part 64 of the FCC's rules (47 C.F.R. 64.2001 through 64.2009).

VTC has trained and provided to all Customer Service Representatives (CSRs) a CPNI manual, which includes the disciplinary action that will be taken if a CPNI breach occurs. I, as VTC's Compliance Officer, have received signed employee certification forms following the above-mentioned training. Written procedures that comply with CPNI rules have also been distributed to CSRs. VTC provides CPNI updates and training to the appropriate employees every 6 months. Annually, certification forms are updated following training by the Compliance Officer.

VTC has mailed opt-out notices to all customers. If a customer chooses to opt-out, their selection is updated in the billing system. The opt-out status is accessible to all CSRs when accessing CPNI data. VTC's Marketing Department removes customers who have opted-out from applicable marketing efforts. Opt-out notices are mailed annually to all VTC customers.

VTC's customer information is kept on a secure server to prevent unauthorized access by hackers and unauthorized employee access. Authorized employees have unique system logins and passwords which determines the level of customer information they can access.

Hannah McElroy  
Compliance Officer Signature

Hannah McElroy  
Printed Name

2/25/08  
Date

**Federal Communications Commission**

**The FCC Acknowledges Receipt of Comments From ...  
Valley Telephone Cooperative, Inc.  
...and Thank You for Your Comments**

**Your Confirmation Number is: '2008228768996 '**

**Date Received: Feb 28 2008**

**Docket: 06-36**

**Number of Files Transmitted: 1**

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*updated 12/11/03*